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Attorney for Plaintiff.

UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA

GURMEET SINGH,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
 SECURITY, ET AL,

Defendants.

No. C 07-02202 JCS

**STIPULATION TO EXTEND DATES;
 [PROPOSED] ORDER**

Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. The plaintiff filed an action in this Court on April 23, 2007, seeking review of the decisions by the U.S. Citizenship and Immigration Services ("USCIS") to deny his Form I-485 application for adjustment of status and the Form I-730 petitions that the plaintiff filed on behalf of his wife, step-son, and son.

2. Pursuant to a stipulation signed by this Court on October 3, 2007, the parties agreed to file cross-motions for summary judgment by November 12, 2007; to file cross-oppositions by November 26, 2007; to file cross-replies by December 3, 2007; and to participate in a hearing on February 15, 2008.

3. USCIS *sua sponte* reopened the I-485 application and the I-730 petitions on January 29, 2008 and provided the plaintiff 87 days to submit whatever materials and legal argument he wishes to USCIS in support of his application for adjustment of status (Form I-485

1 application) and asylee petitions (I-730 petitions). Plaintiff timely filed his response and is
2 currently awaiting a decision from Defendants.

3 4. Accordingly, in order to allow sufficient time for Defendants to issue decisions
4 on his Plaintiff's application for adjustment of status (Form I-485 application) and asylee
5 petitions (I-730 petitions), the parties respectfully request that, pursuant to their stipulation, the
6 Court extend the date of the Case Management Conference until June 6, 2008 at 1:30 p.m. and
7 set May 30, 2008 as the deadline for filing an updated joint case management statement.

8 DATED: May 16, 2008

Respectfully submitted,

LAW OFFICE OF ROBERT B. JOBE

/s/

ROBERT B. JOBE
Attorney for Plaintiff

13 DATED: May 16, 2008

JOSEPH P. RUSSONIELLO
United States Attorney

/s/

EDWARD A. OLSEN
Assistant United States Attorney
Attorneys for Defendants

[PROPOSED] ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED that the Case Management Conference be reset to June 6, 2008 at 1:30 p.m. and an updated joint case management conference statement shall be due by May 30, 2008.

IT IS SO ORDERED.

DATED: May 19, 2008

